

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: BARRY E. ROTHERMEL and	:	CHAPTER 13
PATRICIA ROTHERMEL	:	
Debtor(s)	:	
	:	
CHARLES J. DEHART, III	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
BARRY E. ROTHERMEL and	:	
PATRICIA ROTHERMEL	:	
Respondent(s)	:	CASE NO. 1-18-bk-01415

TRUSTEE’S OBJECTION TO FOURTH AMENDED CHAPTER 13 PLAN

AND NOW, this 24th day of February, 2021, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)’ plan for the following reason(s)

1. The Trustee avers that debtor(s)’ plan is not feasible based upon the following:
  - a. Plan ambiguous – payment. (Deutsche Bank/SPS claim charged off)

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Charles J. DeHart, III  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/James K. Jones  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 24th day of February, 2021, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Gary Imblum, Esquire  
4615 Derry Street  
Harrisburg, PA 17111

/s/Deborah A. Behney  
Office of Charles J. DeHart, III  
Standing Chapter 13 Trustee